

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION**

In re: Michael A. Thompson and Amber Thompson Debtors. Michael A. Thompson and Amber Thompson Movants. v. Nationstar Mortgage LLC Respondent.	Bankruptcy 22-10333-JCM Chapter 13 Related to Doc. No. 74
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**LIMITED RESPONSE TO MOTION TO SELL PROPERTY FREE AND CLEAR OF
LIENS UNDER SECTION 363(F)**

Nationstar Mortgage LLC ("Secured Creditor"), by and through its undersigned attorney, hereby files its Limited Response to Motion to Sell Property Free and Clear of Liens under Section 363(f) ("Motion") (DE#74) and in support thereof states as follows:

1. Secured Creditor holds a first lien on the subject property located at 810 Federal Drive Sharon, PA 16146 (the "Property").
2. This Court has exclusive jurisdiction over the property in question under 28 USC Section 1334.
3. On November 1 2023, the Debtor filed the instant Motion to Sell Property (the "Motion"). The Debtor's Motion seeks the Court's approval to sell the Subject Property for \$60,000.00 (the "Proposed Sale Price").
4. The estimated payoff of Secured Creditor's lien is \$ 43,484.81 as of December 11, 2023. Secured Creditor will provide an updated payoff at or near the scheduled closing of the sale.
5. Secured Creditor does not object to the Debtor's Motion to the extent that any sale is subject to Secured Creditor's lien and that Secured Creditor's lien will be paid in full at the closing of said sale based upon an up to date payoff quote.
7. Furthermore, Secured Creditor requests that failure to complete any sale within 90-days of entry of this Order will result in any Order authorizing the sale to be deemed moot.

WHEREFORE, Secured Creditor respectfully requests the Motion be conditionally granted, and any order granting the Motion shall include the terms identified herein; and for such other and further relief as the Court deems just and proper.

Dated: November 17, 2023

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Michael A. Thompson and Amber Thompson Debtors.	Chapter 13
Michael A. Thompson and Amber Thompson Movants.	Related to Doc. No. 74
v.	
Nationstar Mortgage LLC Respondent.	

CERTIFICATE OF SERVICE

I certify under penalty of perjury that I served the above captioned pleadings at the addresses specified below on **November 17, 2023**

The types of service made on the parties were:

By First-Class Mail:

Michael A. Thompson
3366 McConnell Road
Hermitage, PA 16148

Amber Thompson
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Hermitage, PA 16148

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